

Liani J. Reeves, OSB No. 013904

lreeves@bullardlaw.com

Kalia J. Walker, OSB No. 154434

kwalker@bullardlaw.com

Bullard Law

200 SW Market Street, Suite 1900

Portland, OR 97201

503-248-1134/Telephone

503-224-8851/Facsimile

Attorneys for Defendants University of Oregon and Yue Fang

UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

EUGENE DIVISION

DR. YONGLI ZHANG,

Plaintiff,

v.

**UNIVERSITY OF OREGON, and YUE
FANG,**

Defendants.

Case No. 6:18-cv-00232-MK

**DECLARATION OF KALIA
WALKER IN SUPPORT OF
DEFENDANTS' RESPONSE TO
PLAINTIFF'S OBJECTIONS TO
FINDINGS AND
RECOMMENDATIONS OF THE
MAGISTRATE JUDGE ON CROSS-
MOTIONS FOR SUMMARY
JUDGMENT**

I, the undersigned Kalia J. Walker, declare that:

1. I am a licensed attorney and one of the attorneys for Defendants

University of Oregon and Yue Fang ("Defendants") in the above-entitled case.

///

///

2. Attached hereto as Exhibit 1 is a true and accurate copy of a deposition transcript excerpt from the corporate deposition of James Terborg taken on October 30, 2018.

I HEREBY DECLARE THAT THE ABOVE STATEMENT IS TRUE TO THE BEST OF MY KNOWLEDGE AND BELIEF, AND THAT I UNDERSTAND IT IS MADE FOR USE AS EVIDENCE IN COURT AND IS SUBJECT TO PENALTY FOR PERJURY.

DATED: November 8, 2019.

By s/Kalia J. Walker

Liani J. Reeves, OSB No. 013904

lreeves@bullardlaw.com

503-248-1134/Telephone

503-224-8851/Facsimile

Attorneys for Defendants

University of Oregon and Yue Fang



Planet Depos®
We Make It *Happen™*

Transcript of James Terborg, Designated Representative

Date: October 30, 2018

Case: Yongli Zhang -v- University of Oregon, et al.

Planet Depos

Phone: 888.433.3767

Email: transcripts@planetdepos.com

www.planetdepos.com

1 Q. What was that?

2 A. I became senior associate dean for faculty
3 affairs.

4 Q. Okay. When was that?

5 A. Maybe 2015, '16. I'm not sure. Could be '14,
6 '15. I'm not sure on the exact date, the year that that
7 I retired.

8 Q. Okay. And then -- and then when did you become
9 interim dean?

10 A. Officially, September I think of 2016, but it
11 might be 2015. I'm not trying to be evasive here. I
12 just don't recall the exact years.

13 Q. I will represent to you that my client, Yongli
14 Zhang, came up for tenure in the fall of 2015.

15 A. Okay.

16 Q. And then met with you in January of 2016 or
17 February of 2016, and you were the interim dean by then.

18 A. Okay. I assume that's correct, yes.

19 Q. So having represented that to you, do you think
20 that you were starting to be the interim dean in
21 September of 2015?

22 A. Yes. Then the year prior to that I would have
23 been senior associate dean for faculty affairs. The year
24 prior to that I would have been department head.

25 Q. I understand. And working part time

CERTIFICATE

I, Traci R. Moore, an Oregon Shorthand Reporter, hereby certify that said witness personally appeared before me at the time and place set forth in the caption hereof; that at said time and place I reported in stenotype all testimony adduced and other oral proceedings had in the foregoing matter; that thereafter my notes were transcribed through computer-aided transcription, under my direction; and that the foregoing pages constitute a full, true and accurate record of all such testimony adduced and oral proceedings had, and of the whole thereof. I further certify review of the transcript was waived.

Witness my hand at Portland, Oregon, this 12th day of November, 2018.

Traci R. Moore



Traci R. Moore
Notarial Commission
No. 975016
Expires 5/30/2022

CERTIFICATE OF SERVICE

I hereby certify that on November 8, 2019 I served the foregoing
**DECLARATION OF KALIA WALKER IN SUPPORT OF DEFENDANTS'
RESPONSE TO PLAINTIFF'S OBJECTIONS TO FINDINGS AND
RECOMMENDATIONS OF THE MAGISTRATE JUDGE ON CROSS-
MOTIONS FOR SUMMARY JUDGMENT** on:

David Griggs
Griggs Law Group PC
4900 SW Griffith Drive, Suite 165
Beaverton, OR 97005

Adam Carter
R. Scott Oswald
The Employment Law Group, PC
888 17th St. NW, 9th Floor
Washington D.C., DC 20006

- ☒ by **electronic** means through the Court's Case Management/Electronic Case File system, which will send automatic notification of filing to each person listed above.
- ☐ by **mailing** a true and correct copy to the last known address of each person listed. It was contained in a sealed envelope, with postage paid, addressed as stated above, and deposited with the U.S. Postal Service in Portland, Oregon.
- ☐ by causing a true and correct copy to be **hand-delivered** to the last known address of each person listed. It was contained in a sealed envelope and addressed as stated above.
- ☐ by causing a true and correct copy to be delivered **via overnight courier** to the last known address of each person listed. It was contained in a sealed envelope, with courier fees paid, and addressed as stated above.
- ☐ by **faxing** a true and correct copy to the last known facsimile number of each person listed, with confirmation of delivery. It was addressed as stated above.
- ☐ by **emailing** a true and correct copy to the last known email address of each person listed, with confirmation of delivery.

s/Kalia J. Walker

Liani J. Reeves, OSB No. 013904
Attorneys for Defendants
University of Oregon and Yue Fang